

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

In the Matter of)	
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LightSquared Inc.)	IB Docket No. 11-109
Petition for Declaratory Ruling)	ET Docket No. 10-142
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COMMENTS OF CTIA – THE WIRELESS ASSOCIATION®

CTIA – The Wireless Association® (“CTIA”)¹ hereby submits its Comments on the above-captioned Petition for Declaratory Ruling (“*Petition*”)² filed by LightSquared Inc. (“LightSquared”) regarding the regulatory status of commercial Global Positioning System (“GPS”) receivers vis-à-vis LightSquared’s authorized operations in the 1525-1559 MHz Mobile-Satellite Service (“MSS”) band.

While CTIA recognizes that interference to GPS receivers is a serious issue, this specific example of interference between neighboring uses highlights the importance of investigating the issue of receiver performance. As consumer demand for broadband services continues to rise exponentially, the Commission must ensure the fullest utilization of spectrum licensed for

¹ CTIA is the international association of the wireless communications industry for both wireless carriers and manufacturers. Membership in the organization covers Commercial Mobile Radio Service (“CMRS”) providers and manufacturers, including cellular, Advanced Wireless Service, 700 MHz, broadband PCS, and ESMR, as well as providers and manufacturers of wireless data services and products.

² *Petition for Declaratory Ruling*, IB Docket No. 11-109, ET Docket No. 10-142 (filed Jan. 30, 2012) (“LightSquared Petition”).

wireless broadband services. CTIA continues to hope that there is a solution that can allow LightSquared to launch its service while addressing concerns regarding interference. As CTIA previously explained in its Petition for Clarification and/or Reconsideration (“*Petition for Reconsideration*”),³ in the Mobile-Satellite Service / Ancillary Terrestrial Component (“MSS/ATC”) bands, Section 25.255 of the Commission’s rules places full responsibility for any interference mitigation on the MSS/ATC licensee.⁴ With that rule as a “backstop,” CTIA agrees with LightSquared and others that further work must be done to address receiver performance to maximize spectral efficiency and prevent harmful interference into licensed services.

Recent developments highlight the role that receiver performance can play in interference avoidance. For example, the recently enacted Middle Class Tax Relief and Job Creation Act of 2012 instructs the Comptroller General of the United States to consider receiver performance “as it relates to increasing spectral efficiency.”⁵ The Chairman of the House Subcommittee on Communications & Technology, Rep. Greg Walden (R-OR), also has suggested that he may convene a hearing to discuss the issue of receiver performance. In addition, the Commission recently recognized that new approaches to receiver performance “may enable more assured deployment of new services and reduce the necessity for involvement of regulators.”⁶ Accordingly, the Commission will hold a workshop on spectrum efficiency and receiver

³ *Petition for Clarification and/or Reconsideration of CTIA – The Wireless Association*, ET Docket No. 10-142 (filed Jun. 30, 2011) (“CTIA Petition for Reconsideration”).

⁴ CTIA hereby incorporates by reference the CTIA Petition for Reconsideration and its *Reply to Oppositions to Petition for Reconsideration of CTIA – The Wireless Association*, ET Docket No. 10-142 (filed Sep. 6, 2011) regarding responsibility for interference mitigation.

⁵ See Middle Class Tax Relief and Job Creation Act of 2012, Pub. L. No. 112-96, 126 Stat. 156, §6408 (2012).

⁶ *Office of Engineering and Technology, Wireless Telecommunications Bureau, and Office of Strategic Planning Announce Workshop on “Spectrum Efficiency and Receiver Performance,”* Public Notice, DA 12-280 (rel. Feb. 24, 2012).

performance on March 12, 2012. CTIA submits industry and government stakeholders should work together in these efforts to advance receiver performance to maximize spectral efficiency. The wireless industry provides a good example of how the employment of high performance receivers can help to more efficiently utilize spectrum resources.

While CTIA has previously demonstrated that the Commission's ATC rules have always placed full responsibility for interference mitigation on the MSS/ATC licensees,⁷ CTIA also believes that this is an issue that can and should be investigated by subject matter experts from industry and government. CTIA looks forward to taking a leadership role in this issue and working with the Commission, the Comptroller General, and other interested stakeholders to facilitate these efforts.

Respectfully submitted,

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⁷ See *supra* note 3.